



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**
100 CHURCH STREET
NEW YORK, N.Y. 10007

ELIDA M. ALFARO
phone: (212) 356-2334
fax: (212) 356-3509
ealfaro@law.nyc.gov

June 9, 2022

VIA ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street, Room 701
New York, NY 10007

Re: *McGill, et al. v. City of New York, et al.*, 21 CV 8619 (LJL)

Your Honor:

I am an attorney in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to the defense of the above-referenced matter. I write on behalf of the parties to respectfully request that the Court extend the time to amend or join additional parties from June 20, 2022 to August 19, 2022 to allow for continued exchange of documentary discovery. This is the parties' first extension request of this deadline. This matter is next scheduled for a Status Conference before Your Honor on November 9, 2022.

Following Your Honor's March 28, 2022 Scheduling Order, the parties have commenced discovery. Pursuant to Your Honor's March 28, 2022 Scheduling Order, the parties timely exchanged Initial Disclosures on April 5, 2022 and served requests for production of documents and interrogatories on April 21, 2022. See Civil Docket Sheet Entry No. 33. Since that time the parties have worked to identify documents responsive to the respective requests and are continuing to do so. In addition, with regard to the law students previously representing plaintiffs, as the Spring 2022 semester has concluded, the law students previously authorized to appear on plaintiffs' behalf are no longer assigned to the instant matter and it is anticipated that additional students will join plaintiffs' counsel at the start of the Fall 2022 semester in August.

Following conferral between the parties via e-mail on June 3, 2022 regarding their continued efforts to receive documents and information responsive to the instant requests as well as the change in semesters, the parties are amenable to extending the time to amend or join additional parties until August 19, 2022 to allow for continued exchange of discovery.

In light of the foregoing, the parties request that the time to amend or join additional parties be extended until August 19, 2022. Pursuant to Your Honor's Individual Rule 1(C), the parties have attached a Proposed Scheduling Order indicating the proposed revision.

Thank you for your time and consideration herein.

Respectfully submitted,

Elida M. Alfaro

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Assistant Corporation Counsel

Special Federal Litigation Division

cc: *All counsel of record* (via ECF)